

AO 91 (Rev. 11/11) Criminal Complaint

# UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States of America

v.  
Oscar PARKER II

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Case No.

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 13, 2021 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

8 USC 1324

*Offense Description*

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet.

/S/Javier Medrano

*Complainant's signature*

Javier Medrano

Border Patrol Agent

*Printed name and title*

Sworn to before me and signed in my presence,

Date: October 15, 2021

*Judge's signature*

City and state: Laredo, Texas

Christopher Dos Santos

U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

In support of Criminal Complaint

**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT****V.****Oscar PARKER II**

Case Number:

On October 13, 2021, United States (U.S.) Border Patrol Agents (BPAs) were working their assigned duties at the United States Border Patrol Checkpoint, located at mile-marker 29 on U.S. Interstate Highway 35 (IH-35), near Laredo, Texas in Webb County. At approximately 11:30 a.m., a green Tractor hauling a flatbed trailer approached the primary lane for an immigration inspection.

The BPA at the primary inspection lane conducted an immigration inspection of the driver later identified as Oscar Parker II. Parker II claimed to be a United States citizen. Simultaneously, a BPA canine team performed a free air sniff of the exterior of the tractor with his service canine. The BPA canine handler advised the agent at primary that his service canine had alerted to the odor of concealed humans or controlled substances. The BPA canine handler asked Parker for consent to open a tractor small cargo area side door. Parker provided consent and opened the small cargo area door. The BPA canine handler inspected the area and referred the vehicle to secondary for further inspection.

At secondary, additional BPAs removed Parker II from the tractor. The BPA canine handler performed another free air sniff of the exterior of the tractor with his service canine. The BPA canine handler advised that the canine had alerted again to an odor the canine is trained to detect. The BPA canine handler entered the tractor and performed an inspection of the tractor and sleeper area. Upon inspection, the BPA canine handler discovered 14 subjects hiding underneath a black blanket in the sleeper area. BPAs performed an immigration inspection of the 14 subjects. All 14 subjects admitted to being in the United States illegally with no legal right to enter or remain in the United States. At that time PARKER II and the 14 undocumented noncitizens were placed under arrest and escorted inside the checkpoint for further processing.

Oscar Parker II was read his Miranda Rights, Parker II understood and acknowledged his rights by signing Service Form I-214, and advised he was not willing to provide a statement without an attorney present.

Alberta Ventura-Ramirez, a national of Mexico, is serving as a material witness in the case. Ventura-Ramirez stated she made arrangements to be smuggled into the United States for \$12,000 United States Dollars (USD). Ventura-Ramirez stated she made an illegal entry into the U.S. by crossing the Rio Grande River on October 06, 2021. After crossing the river, she was picked up by an unknown male driving a black pickup truck and taken to a house until the day she was apprehended at the checkpoint (October 13, 2021). Ventura-Ramirez stated the day she was apprehended at the checkpoint, the unknown male picked her up at the house and transported her to an unknown location where a green tractor was parked. Ventura-Ramirez stated once at the location, the unknown male instructed her to enter the tractor. Ventura-Ramirez stated the tractor was turned on, unlocked, and occupied by the driver. Ventura-Ramirez stated the driver used a cellphone to translate and communicated with her and the other subjects. Ventura-Ramirez stated the driver arranged her and other subjects on the bed. Ventura-Ramirez described the driver as tall, dark complected male wearing a gray shirt. Ventura-Ramirez was presented with a six-person photo line-up array and was able to positively identify Oscar Parker II as the driver of the green tractor.

Wendy Garcia-Landaverde, a national of El Salvador, is serving as a material witness in the case. Garcia-Landaverde stated she made arrangements to be smuggled into the United States for \$14,000 USD. Garcia-Landaverde stated she along with seven other subjects made an illegal entry into the U.S. by swimming across the Rio Grande River on October 01, 2021, near Laredo, Texas. After crossing the river, she was picked up by an unknown male driving a white and black Sports Utility Vehicle and transported to a house. Garcia-Landaverde stated the night before she was apprehended (October 12, 2021) she was transported and taken to a hotel room. Garcia-Landaverde stated there were another 12 to 13 subjects at the hotel room. Garcia-Landaverde stated the day of the apprehension (October 13, 2021), an unknown male in a white pickup truck, transported her along with the other 12 to 13 subjects to an unknown street where a green tractor with a trailer bed was parked. Garcia-Landaverde stated the driver of the pickup truck instructed them to get inside the tractor and told them the tractor was going to transport them to San Antonio. Garcia-

Landaverde stated that inside the tractor, she saw a chubby dark skin tone male and that he sat on the driver's seat. Garcia-Landaverde stated the driver used his cellphone to provide instructions as to sit, lay on top of the bed, and not to move or make any sounds. Garcia-Landaverde was presented with a six-person photo line-up array and was able to positively identify Oscar Parker II as the driver of the green tractor.

SUBSCRIBED and SWORN to before me on

15th day of October, 2021

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Signature of Judicial Officer

/S/ Medrano, Javier Border Patrol Agent  
Signature of Complainant